

EXHIBIT C

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

2001 K STREET, NW
WASHINGTON, DC 20006-1047
TELEPHONE (202) 223-7300

DIRECT DIAL: (202) 223-7407
EMAIL: KSMITH@PAULWEISS.COM

NEW YORK
BEIJING
BRUSSELS
HONG KONG
LONDON

LOS ANGELES
SAN FRANCISCO
TOKYO
TORONTO
WILMINGTON

November 22, 2024

VIA MDL CENTRALITY, CERTIFIED MAIL, AND EMAIL

Re: MDL 3084 – Order re Withdrawal of Counsel in Case No. 3:23-cv-06357-CRB, MDLC ID 1283

Dear A.P.,

We write on behalf of our client, Uber Technologies Inc. (“Uber”), regarding *A.P. v. Uber Technologies, Inc., et al.*, 3:23-cv-06357-CRB, MDLC ID 1283 which you filed in *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB (“the MDL”). On August 30, 2024, Pulaski Kherkher, PLLC moved to withdraw its representation of you on the grounds that you have “failed to respond to [your counsel’s] numerous communication attempts via telephone, email and text.” *A.P.*, No. 3:23-cv-06357-CRB, ECF 8 at 1 (Exhibit 1). On November 18, 2024, the Court granted that motion. *A.P.*, No. 3:23-cv-06357-CRB, ECF 10 at 1 (Exhibit 2). It is our understanding that you have not found replacement counsel and are no longer represented by an attorney. If that understanding is incorrect, please provide this communication to your attorney, and have your attorney contact us via the information provided above or below as soon as possible.

The Court’s Order states that “Within 28 days of this order, each plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If any plaintiff does not file that notice, the Court will dismiss their case without prejudice.” Exhibit 2 at 1. The Court also ordered Uber’s counsel to “provide a copy of this order to the plaintiff.” *Id.* The Court’s Order is attached to this correspondence as Exhibit 2. Per this Order, you must “file a notice indicating whether [you] intend to pursue the action with new counsel or representing [yourself]” within 28 days of November 18, 2024, i.e. by Monday, December 16, 2024, or else “the Court will dismiss [your] case without prejudice.”

We ask that you please email us confirmation of your receipt of this letter, via email to ksmith@paulweiss.com and rcunningham@paulweiss.com, at your earliest opportunity. If you would like to discuss the letter’s contents further, please let us know, and we would be happy to organize a meet and confer.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

A.P.

2

Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Kyle Smith

Kyle Smith
2001 K Street, NW
Washington, DC 20006
(202) 223-7407
ksmith@paulweiss.com

Exhibit 1

1 D. Douglas Grubbs (*Admitted PHV*)
2 **PULASKI KHERKHER, PLLC**
2925 Richmond Avenue, Ste 1725
Houston, TX 77098
3 713-664-4555
4 Email: dgrubbs@pulaskilawfirm.com

5 *Counsel for Plaintiff*

6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,
11 PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

12 This Document Relates to:

13 *A.P. vs. Uber Technologies, Inc., et al;*
14 *3:23-cv-06357-CRB*

15 **MOTION TO WITHDRAW AS**
16 **COUNSEL OF RECORD**

17 Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher,
18 PLLC, counsel of record for Plaintiff A.P. (“Counsel”), respectfully moves this
19 Court for an Order allowing his firm to withdraw as counsel of record in the above-
20 captioned matter.

21
22 Over the past several months, Plaintiff A.P. has failed to respond to
23 Counsel’s numerous communication attempts via telephone, email and text.
24 Counsel has made at least 25 communication attempts to Plaintiff since mid-April.
25 Counsel has also performed multiple public record searches and confirmed that
26 A.P.’s contact information is still accurate.
27
28

1 On August 13, 2024, Counsel advised Plaintiff in writing of their intent to
2 withdraw from this matter via electronic mail and Federal Express. As of the time
3 of this filing, Plaintiff has failed to respond. Counsel also advised Defendants of
4 their intent to withdraw from this matter during a meet and confer conference on
5 August 20, 2024 regarding Plaintiff's fact sheet.
6

7 WHEREFORE, the law firm of Pulaski Kherkher, PLLC; and all attorneys
8 of record for Plaintiff request that they be allowed to withdraw as counsel of record
9 for Plaintiff A.P. A copy of this motion will be served upon Plaintiff at her last
10 known address and via electronic mail.
11
12
13

14 Dated: August 30, 2024

Respectfully submitted,

16 **PULASKI KHERKHER, PLLC**

17 /s/ D. Douglas Grubbs

18 D. Douglas Grubbs

19 TX Bar No. 24065339

(Admitted Pro hac vice)

20 2925 Richmond Avenue, Suite 1725

21 Houston, Texas 77098

22 Tel: 713-664-4555

Facsimile: 713-664-7543

23 dgrubbs@pulaskilawfirm.com

24 Counsel for Plaintiff
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2024, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: MDL3084-service-Uber@paulweiss.com.

/s/ D. Douglas Grubbs
D. Douglas Grubbs

D. Douglas Grubbs (*Admitted PHV*)
PULASKI KHERKHER, PLLC
2925 Richmond Avenue, Ste 1725
Houston, TX 77098
713-664-4555
Email: dgrubbs@pulaskilawfirm.com

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

A.P. vs. Uber Technologies, Inc., et al;
3:23-cv-06357-CRB

**[PROPOSED] ORDER GRANTING
WITHDRAWAL OF COUNSEL OF
RECORD**

CONSIDERING the foregoing Motion to Withdraw as Counsel of Record for
A.P.

IT IS HEREBY ORDERED that Pulaski Kherkher, PLLC is withdrawn as
Plaintiff's counsel of record and shall be relieved of any further responsibility in
connection with this action.

Dated: _____

HONORABLE CHARLES R. BREYER
United States District Court Judge

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084

**ORDER GRANTING MOTIONS TO
WITHDRAW AS COUNSEL**

Re: Dkt. Nos. 1683, 1806, 1807, 1815

This Order Relates To:

A.P. vs. Uber Inc.,
Case No. 3:23-cv-06357-CRB

J.C. vs. Uber Inc.,
Case No. 3:24-cv-03965-CRB

T.L. vs. Uber Inc.,
Case No. 3:24-cv-03966-CRB

K.R. vs. Uber Inc.,
Case No. 3:23-cv-06313-CRB

The motions to withdraw filed by Plaintiffs' counsel in the above-captioned cases are granted. Within 28 days of this order, each plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If the plaintiff does not file that notice, the Court will dismiss their case without prejudice.

Uber's counsel shall provide a copy of this order to the plaintiff and file a declaration within 7 days of this ruling explaining how they did so.

IT IS SO ORDERED.

Dated: November 18, 2024



CHARLES R. BREYER
United States District Judge